

C. Renée Manes
Assistant Federal Public Defender
Email: renee_manes@fd.org
101 SW Main Street, Suite 1700
Portland, OR 97204
Tel: (503) 326-2123
Fax: (503) 326-5524

Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JESSE DAVID BENNETT,

Defendant.

Case No. 3:23-cr-00112-IM

**DEFENDANT’S SENTENCING
MEMORANDUM**

Defendant Jesse David Bennett, through his attorney, C. Renée Manes, submits the following sentencing memorandum.

Mr. Bennett, the government, and the Pre-Sentence Report all suggest a sentence of time served, which is a period of fourteen months from the date of his arrest.¹ We acknowledge

¹ If Mr. Bennett had been sentenced to a period of sixteen months, this would be the sentence served.

that Mr. Bennett's conduct is disturbing. Mr. Bennett suffers from significant mental health infirmities, some of which have been recently diagnosed, which are causal in his conduct. Nevertheless, Mr. Bennett acknowledges his own responsibility and culpability, and is truly sorry for his conduct.

The defense team has put in place a plan to assist Mr. Bennett obtain appropriate housing, financial assistance, and treatment when he is released. In addition, counsel for both parties have worked together to provide a list of individuals that Mr. Bennett agrees not to contact, and a list and map of addresses where he will not go. With the anticipated level of assistance, we believe that Mr. Bennett will be able to avoid the stresses that lead him to his current offenses.

Given these facts, we believe that a sentence of time served is appropriate under the sentencing factors set forth in 18 U.S.C. § 3553(a), and is sentence that is sufficient but no more than necessary to punish the conduct undertaken by Mr. Bennet.

RESPECTFULLY SUBMITTED this 16th day of May, 2024.

/s/ C. Renée Manes

C. Renée Manes

Attorney for Defendant